

Maryland DNR Forest Service

Tawes Building, 580 Taylor Avenue
Annapolis State Maryland 21401

SFI 2015-2019 Standards and Rules®
Section 2 – Forest Management

Recertification Audit





NSF Forestry Program Audit Report

A. Certificate Holder

Maryland DNR Forest Service

NSF Customer Number

0Y301

Contact Information (Name, Title, Phone & Email)

Jack Perdue
Forest Resource Planning
[410-260-8505](tel:410-260-8505) (office)
jack.perdue@maryland.gov

B. Scope of Certification

The forest management program of the Maryland Department of Natural Resources on the following Maryland State Forests: Chesapeake Forest Lands, Pocomoke State Forest, Green Ridge State Forest, Garrett State Forest, Potomac State Forest and the Savage River State Forest. The SFI Forest Management number is NSF-SFI-FM-0Y301.

Locations Included in the Certification

Chesapeake Forest Lands
Pocomoke State Forest
Green Ridge State Forest
Garrett State Forest
Potomac State Forest
Savage River State Forest

C. Audit Team

Keri Yankus, Sr. NSF Lead Auditor
Michelle Matteo, Sr. NSF Lead Auditor

Audit Date(s) (If multiple locations were audited, indicate the date of each site visit)

April 2 & 3, 2019 MD-DCR Office – Snow Hill Office-Pocomoke State Forest (SF) & Chesapeake (SF)
6572 Snow Hill Rd, Snow Hill, MD
April 4, 2019 Green Ridge SF -28700 Headquarters Drive NE, Flintstone, MD
April 5, 2019 Green Ridge SF and the Main office Annapolis- 580 Taylor Ave, Annapolis, MD

D. Significant Changes to Operations or to the Standard(s)

None

E. Audit Results

No nonconformities or opportunities for improvement were identified.

There was/were 7 opportunity(ies) for improvement identified.

SFI 2.1.1: Documented *reforestation* plans, including designation of all harvest areas for either natural, planted or direct seeded regeneration and prompt *reforestation*, unless delayed for site-specific environmental or *forest health* considerations or legal requirements, through *planting* within two years or two *planting* seasons, or by planned *natural regeneration* methods within five years.

OFI: Regeneration criteria are forest-type specific. Confirmed that Western SFs use Oak-SILVAH for criteria and for protocols for regeneration surveys. No regeneration delays were observed in the field. Although planting is rare, there is an opportunity for improvement in the regeneration criteria in order to achieve acceptable species and stocking levels for naturally regenerating stands in the Eastern Region.

SFI 2.2.5: Use of Pesticides banned under the Stockholm convention and Persistent Organic pollutants.

OFI: Although Pesticides are currently checked to the FSC checklist, there is an opportunity to improve the chemical review process, both internally and with external contractors, to ensure that current and future uses of pesticides that are banned under the Stockholm convention and Persistent Organic pollutants are not being used.

SFI 3.1.3: Monitoring of overall best management practices implementation.

OFI: The organization currently conducts BMP monitoring with written checklists. Different checklists are used in the Eastern Shore and the Western SFs. There is an opportunity to improve the similarity of criteria used in the West vs the Eastern Shore (example with the criteria for 1-5 verses Yes NO and NA noted) in order to help improve consistency of evaluation of BMP effectiveness.

SFI 8.2.1 *Program Participants with forest management responsibilities on public lands shall confer with affected Indigenous Peoples with respect to sustainable forest management practices. Indicator:*

8.2.1 *Program that includes communicating with affected Indigenous Peoples to enable Program Participants to:*

- a) understand and respect traditional forest-related knowledge;
- b) identify and protect spiritually, historically, or culturally important sites;
- c) address the use of non-timber forest products of value to Indigenous Peoples in areas where Program Participants have management responsibilities on public lands; and
- d) respond to Indigenous Peoples' inquiries and concerns received.

OFI: Although the Chesapeake/Pocomoke Forest Citizens Advisory Committee member has been recently established, there is an opportunity to continue efforts and seek input from indigenous people, including all MD State Forest regions, as the last formal outreach efforts were completed 5-6 years ago and per interview, there is not a regularly scheduled interval to re-evaluate the MD DNR SF outreach efforts.

SFI 11.1.2 *Assignment and understanding of roles and responsibilities for achieving SFI 2015-2019 Forest Management Standard objectives.*

OFI: There is an opportunity to improve the assignment and understanding of roles and responsibilities as it relates to contract requirements, per review of the Stone Mountain Road contract #0217. Internal contractual documents were incomplete on one page of the contract; per interview with multiple DNR staff, there were differing thoughts as to who was responsible for noting the official date and signature on the contract, i.e.: State Forest Staff vs. Central Office staff in Annapolis.

SFI 11.1.3 *Staff education and training sufficient to their roles and responsibilities.*

OFI: While the seed mix used on landings and roads has been previously approved by State Wildlife staff for food plots and for the Erosion and Sediment Control plan, there is an opportunity to improve staff education and training as it relates to the seed mixture (species and ratios) currently being applied on landings and roads, as only non-native, naturalized species are being used.

SFI 15.1.2: *System for collecting, reviewing, and reporting information to management regarding progress in achieving SFI 2015-2019 Forest Management Standard objectives and performance measures.*

OFI: Currently the document "Internal Review-ISA-FIELD-CHECKLIST-ALL-SF- is used; there is an opportunity to consider using other foresters from different regions to help strengthen and improve current auditing processes.

There was/were 1 minor nonconformity(ies) identified.

SFI 11.1.4: Contractor education and training sufficient to their roles and responsibilities.

Minor: This process is not fully effective.

Evidence: Contract logger is a MD Master Logger, however there were issues with the equipment on-site. Dozer was persistently leaking on site onto the soil below the equipment, some oil was observed on the soil below the Skidder. Logger was not on site. No apparent safety equipment (no fire extinguishers & spill kits observed on all 3 machines on an active site), however, later interview stated that the fire extinguishers were behind the seats of the skidder and harvester out of view. Recent BMP inspection conducted by forester noted no issues.

There was/were 0 major nonconformity(ies) identified.

Issues identified at previous audits reviewed for continued conformance.

3 Previous OFI identified from the last audit were reviewed and closed. Management plans were in process of being reviewed regarding accurately describing the status (ongoing vs. completed) of selected activities; Use of the trademark symbol (™) was reviewed for all documents and were updated; and organization had a workshop to help improve awareness of predicted climate change patterns and the impacts to wildlife and biodiversity for foresters.

Yes No N/A (not using) All logos and/or labels, including ANSI, ANAB, SFI, PEFC, ATFS, etc., are utilized correctly in accordance with NSF SOP 14680 and SOP 4876. If answering “No”, a finding of nonconformity should be issued.

For Recertification Audits:

Auditors are required to review the reports from all audits in the current certification period, starting with the certification or recertification audit and including all surveillance or other audits. The auditor shall consider the performance of the program over the cycle through a review of internal audits, management reviews, corrective actions, continual improvement, and NSF audit findings, to determine if there is evidence of:

- An effective interaction between all parts of the program and its overall effectiveness?
- An overall effectiveness of the system in its entirety in light of internal and external changes?
- A demonstrated commitment by top management to maintain the effectiveness and improvement of the system to enhance overall performance?
- Continual improvement over the cycle?
- The program contributing to the achievement of the client’s policy and objectives, and the intended results?
- Repeated audit findings during the audit cycle that would indicate systemic issues?

Answer: MD DNR has demonstrated effective implementation by having annual internal audits (2011-2010) and management reviews each fiscal year (2011 thru 2019). NSF auditor reviewed documented internal audits and management reviews over the audit cycle which demonstrated continual commitment by the organization. The organization over the life of the certificate addressed all internal/external findings including the recent external 3 OFIs issued by NSF in FY 2018. This demonstrates continual improvement. Leadership commitment was demonstrated during the field portion of the audit. The Annapolis Director /State Forester and Associate Director Forester have oversight and input into management system, were actively engaged in communications during a portion of this year’s NSF field audit. This interaction demonstrated leadership commitment and the willingness to contribute to meeting the MDNR objectives in forest certification.

F. Appendices

- [Appendix 1:](#) Audit Notification Letter and Audit Agenda
- [Appendix 2:](#) SFI Forest Management Public Summary Report
- [Appendix 3:](#) Audit Standard Checklist - SFI Forest Management Standard
- [Appendix 4:](#) Site Visit Notes
- [Appendix 5:](#) Meeting Attendance
- [Appendix 6:](#) Multi-site Checklist

Appendix 1**Audit Notification Letter**

5 March 2019

Jack Perdue, Maryland DCR Forest Service
580 Taylor Avenue
Annapolis, MD 21401

RE: SFI® Forest Management Reassessment Audit, Maryland Forest Service

Dear Mr. Perdue,

As we discussed, I will be conducting your SFI® Forest Management audit as described in the attached itinerary. We previously confirmed that these dates are still appropriate for the audit of your program's continued conformance to the standards noted below:

- SFI 2015-2019 Standards and Rules: Section 2, Forest Management

We are scheduled to conduct the 2019 SFI® and FSC® Reassessment Audits of Maryland's state forest system the week of April 1st. This letter provides the SFI audit plan; the FSC audit plan has been provided by Michelle Matteo, SCS Lead Auditor.

The 2019 SFI Reassessment audit is a full review (all Objectives covered) of your SFI Program to confirm that it continues to be in conformance with the SFI 2015-2019 Forest Management Standard and that continual improvement is being made.

Preparing for the Audit

A key part of the audit is a review of selected evidence related to your program, which may include:

- Management Review records
- Documentation for subcontracting/outsourcing
- Documentation for multisite organization (if applicable)
- Policies regarding certification, health, and safety
- Forest Management Plans
- Contracts for harvesting and silvicultural activities
- Documentation for monitoring, non-conformances identified and corrective action
- Approval for logo usage (if used)
- Internal Audit records
- Training records, license, certifications
- Documentation for operation of complaint procedure

Please have this information available for me **during the audit**.

Scope of Certification: The forest management program of the Maryland Department of Natural Resources on the following Maryland State Forests: Chesapeake Forest Lands, Pocomoke State Forest, Green Ridge State Forest, Garrett State Forest, Potomac State Forest, and the Savage River State Forest. The SFI Forest Management number is NSF-SFI-FM-0Y301.



Role of SFI Inc. Office of Label Use and Licensing

As a reminder, your organization is responsible for contacting SFI, Inc. and complying with all requirements before using or changing any SFI label or logo. Your contact is:

Rachel Hamilton, Coordinator, Office of Statistics and Label Use
Sustainable Forestry Initiative, Inc.
343-803-0590
rachel.hamilton@sfiprogram.org

Multi-Site Sampling Plan

Your responsibilities for Public Lands Stewardship include the role of “central administration” for this multi-site program. We will review the SFI multi-site requirements during the office time on April 5th.

The following sites are included in the overall scope: Chesapeake Forest Lands, Pocomoke State Forest, Green Ridge State Forest, Garrett State Forest, Potomac State Forest, and the Savage River State Forest. The 2019 audit will include 3 of these 6, as follows: Pocomoke State Forest, Chesapeake State Forest, and the Green Ridge State Forest. These forests were selected to include a broad cross-section of activities and of the sites and to facilitate travel. Random sampling was not employed in the selection of these 3 forests but will be used in the selection of sites to be visited.

Field Site Selection

Preliminary site selections included preparing a candidate site list of forest stands or areas harvested in the past 2 years with associated forestry environmental risk categories including FORI, RT&E, road construction, riparian areas, and other unique/special sites.

The NSF evaluation team will select an initial subset of sites for your certificate and will ask for supplemental information on these sites, including their accessibility and the likelihood of being actively harvested during the visit. Once we review this information, we will select a subsample of sites to visit.

Final site selection will occur during the opening meeting of the audit. On the opening day of the audit, we would ask you to tell us about any sales that are being worked at that time, and we would add one or two of these if possible. Staff should be prepared to review audit routes each morning.

Agenda for Review

Attached for your review is the tentative agenda that will guide the conduct of the audit. Please contact me via email or phone if you would like to recommend changes or have any questions regarding what is needed for the audit.

I look forward to visiting you and evaluating continual improvement in your SFI Program. Thank you for selecting NSF to provide your audit services.

Sincerely,

Keri Yankus

Keri Yankus

Senior Lead Auditor, NSF

603/340-1304

kyankus@nsf.org



Audit Agenda

Type of Audit

- | | | |
|---|---|---------------------------------------|
| <input type="checkbox"/> Readiness Review (Stage 1) | <input type="checkbox"/> Registration (Stage 2) | <input type="checkbox"/> Surveillance |
| <input checked="" type="checkbox"/> Reassessment | <input type="checkbox"/> Transfer | <input type="checkbox"/> Verification |
| <input type="checkbox"/> Other _____ | | |

Audit Objectives

Determine if certification should be renewed to the following Standards: SFI 2015-2019 Standards and Rules: Section 2, Forest Management

Logistics

SFI FM Audit: Evaluation dates of 2-5 April 2019

Travel: Auditors – Arrive Monday 4/1/19 at BWI

Depart BWI early on Saturday 4/6/19, stay at airport hotel Friday night.

Lodging: MD DNR to coordinate Monday night – Thursday lodging, they will inform auditors to make their own reservations

Meals: Plans should be made to have lunch onsite or another acceptable location to ensure timeliness. Other meals may not require the client's involvement.

Daily Travel: Travel will most likely occur in your vehicle(s) each day during the audit, but the evaluation team may have transportation to each field location at the start and end of each day.

Schedule

Day/Date	Time	Activity/Process and Location to be Audited	Auditor(s)
Tues. 2 April 2019	8:00 am	MD-DCR Office – Snow Hill Office Pocomoke State Forest (SF) & Chesapeake SF 6572 Snow Hill Rd, Snow Hill, MD Opening Meeting <ul style="list-style-type: none"> Introductions, Roles, and Audit Objectives Review Audit Procedures Discuss changes to the Facility Record Sheet (contact information, billing information, review scope, etc.) Emergency and safety procedures for evaluation team Agenda Review; determine interviewees Overview by your staff of program Discussion of corrective action requests / plans Overview of Logo or Label use Field Site Selection <ul style="list-style-type: none"> Predetermined initial list of sites used as a basis for selections Final site selections completed, including additional active sites where present 	Keri Yankus (KY) SFI Lead Auditor Michelle Matteo (MM) FSC Lead Auditor and SFI Team Auditor Ciara McCarthy (CM) FSC Team Auditor
	9:00 am	Field visits - Pocomoke SF and Chesapeake SF	
	4:30 pm	Daily briefing with auditors and DCR staff	



Day/Date	Time	Activity/Process and Location to be Audited	Auditor(s)
Wed. 3 April 2019	8:00 am	Office visit: Parker Forestry Services, contracted company for silvicultural work on Pocomoke & Chesapeake SF 1323 Mount Hermon Rd Ste 8b, Salisbury, MD	KY, MM, CM
	8:30 am	Field visits - Pocomoke SF Field visits - Chesapeake SF	
	4:30 pm	Daily wrap-up with auditors and DCR staff	
		Drive to Green Ridge	
Day/Date	Time	Activity/Process and Location to be Audited	Auditor(s)
Thu. 4 April 2019	8:00 am	Office – Abbreviated Green Ridge SF opening meeting 28700 Headquarters Dr NE, Flintstone, MD	KY, MM, CM
	8:30 am	Field visits – Green Ridge SF	
	4:30 pm	Daily briefing with auditors and DCR staff	
Day/Date	Time	Activity/Process and Location to be Audited	Auditor(s)
Fri. 5 April 2019	8:30 am	MD-DCR Office – Green Ridge SF Document and systems reviews, including management system review, staff interviews	MM, CM
	11:00 pm	Travel to Annapolis office for GIS, Central Office, and Closing Meeting 580 Taylor Ave, Annapolis, MD	
	12:30 pm	Document and systems reviews, including management system review, staff interviews Remaining Issues <ul style="list-style-type: none"> • Completion of audit checklist • Prepare for closing meeting - Auditor(s) take time to consolidate notes and confirm audit findings 	
	4:00 pm	Closing Meeting: Review preliminary findings (potential non-conformities and opportunities for improvement) and discuss next steps	

** Audit conducted jointly with the FSC FM audit; times approximate and may vary.

Appendix 2

Maryland DNR Forest Service 2019 SFI® Forest Management Summary Report

Introduction

The SFI Program of the Maryland DNR Forest Service of Annapolis, Maryland has achieved continuing conformance with the SFI® 2015-2019 Forest Management Standard, including the sustainable harvest level requirement (Performance Measure 1.1), according to the NSF SFI-FS Certification Audit Process.

The Maryland DNR Forest Service initially obtained SFI Certification from NSF on July 24, 2003 and the program was re-certified in July 2006. Initially only the Chesapeake Forest Lands were certified, with the Pocomoke State Forest added in 2009 as part of an expansion of scope that included other recently acquired lands. In 2011 the organization sought and was granted recertification to the current scope based on an audit of the six largest state forests against the SFI 2010-2014 Standard. The state forests included in the current scope were re-certified to the SFI 2015-2019 Standards in April of 2014. The most recent audit was a complete recertification audit conducted April 2019.

The multi-site certificate covers 6 different State Forests (Chesapeake Forest, Pocomoke State Forest, Green Ridge State Forest, Garrett State Forest, Potomac State Forest, and Savage River State Forests) also including the central office located in Annapolis MD. The 2019 audit included office reviews in the following Chesapeake Forest, Pocomoke State Forest, Green Ridge State Forest, and the central office located in Annapolis, MD. Field visits were conducted in 3 out of a total of 6 State Forests. This sample size was determined using the guidelines set forth in IAF-MD1. The State Foresters were selected based on a date rotation of total 6 different Forests. Approximately half of the field sites visited were randomly sampled. Within the 3 selected forests NSF's lead auditor selected field sites for inspection based upon the risk of environmental impact, likelihood of occurrence, special features, and other criteria outlined in NSF's protocols and procedures. 2 field offices, 1 central office and 21 field sites were visited. The 21 field sites consisting of the 3 active timber harvests (hardwood 1st thinning, hardwood even aged, final harvest/clear cut and softwood 2nd thinning), 1 conversion softwood to hardwood, 5 recently closed sale with wildlife considerations, 2 with herbicide application with invasive species, 3 High Conservation Forest, 3 natural regenerations, 2 recreation sites, 2 inactive harvests, and 1 research site. There were also several roads, several smaller road-trail/stream crossings with cross drains and BMPs being applied. Harvest levels are documented in Annual Work Plans and have been at or below levels identified in plans for MD DNR associated inventory and growth data as well as harvest-related planning documents are used to ensure that plans include long term harvest level and consistent with the growth and yield model generated by the PGSF and SRSF. Data from the 5-year stand-level inventory project was used to develop a volume-control target based allowable harvest levels for western forests.

Maryland DNR Forest Service has an extensive program for harvest planning and approval. A Sustainable Forest Management Plan has been developed for each forest, and these plans are regularly updated. Harvests levels have been modeled by forest type for sustainability by area control for a 50-year planning horizon. Based on the Sustainable Forest Management Plan an Annual Work Plan is developed for each forest including planned harvests and other management activities. The Annual Work Plan is reviewed by various agencies in the Maryland DNR, and a Citizen's Advisory Team. It is also posted on the Maryland DNR Forest Service website for public comment for a period of 30 days. Following review of comments, the finalized plan is approved and posted on the Maryland DNR Forest Service website.

This report describes the results of the 2019 Recertification Audit which considered changes in operations, the management review system, and efforts at continuous improvement. All of the SFI requirements were selected for detailed review.

Maryland's State Forests

Maryland DNR Forest Service is responsible for the management of the 215,607 acres of Maryland State Forests through a variety of designations. The Forest Service is supported by other agencies within the Department of Natural Resources including Wildlife, Fisheries, Heritage, and the Natural Resources Police. Various management plans provide a useful summary of the importance of these forestlands and the broad policy goals:

Excerpted from the Savage River State Forest Management Plan:

'The resources and values provided from state forests reach people throughout the State and beyond. These resources and values range from economic too aesthetic and from scientific too inspirational. The Department of Natural Resources is mandated by law to consider a wide variety of issues and uses when pursuing a management strategy for these forests. The importance of considering these factors is acknowledged in the Annotated Code, which establishes the following policy pertaining to state forests and parks:

"Forests, streams, valleys, wetlands, parks, scenic, historic and recreation areas of the state are basic assets. Their proper use, development, and preservation are necessary to protect and promote the health, safety, economy and general welfare of the people of the state. It is the policy of the state to encourage the economic development and the use of its natural resources for the improvement of the local economy, preservation of natural beauty, and promotion of the recreational and leisure interest throughout the state." (Annotated Code of Maryland, Natural Resources Article §5-102)

The Department recognizes the many benefits provided by state forests and has established a corresponding management policy in regulation.

"The state forests are managed to promote the coordinated uses of their varied resources and values for the benefit of all people, for all time. Water, wildlife, wood, natural beauty and opportunities for natural environmental recreation, wildlands experience, research demonstration areas, and outdoor education are major forest benefits." (Code of Maryland Regulations 08.07.01.01)

The 2019 Recertification Audit was performed by NSF on April 2-5, 2019 by an audit team headed by Keri Yankus, Sr. Lead Auditor. Michelle Matteo was the Sr. FSC Lead Auditor and supported the NSF lead auditor for SFI. Audit team members fulfill the qualification criteria for conducting audits contained in SFI 2015-2019 Standards and Rules, Section 9 - Procedures and Auditor Qualifications and Accreditation.

The objective of the audit was to assess conformance of the firm's SFI Program to the requirements of the SFI 2015-2019 Standard and Rules, Section 2 – Forest Management.

The scope of the audit included forest management operations. Forest practices that were the focus of field inspections included those that have been under active management over the planning period of the past 2 years. In addition, practices conducted earlier were also reviewed as appropriate (regeneration and BMP issues, for example); SFI obligations to promote sustainable forestry practices, to seek legal compliance, and to incorporate continual improvement systems were also within the scope of the audit.

The SFI Standard was used without modifying any requirements. SFI requirements that are outside of the scope of Maryland's SFI program were excluded from the scope of the SFI Certification Audit as follows:

- Indicator 10.1.2. Research on genetically engineered trees via forest tree biotechnology shall adhere to all applicable federal, state, and provincial regulations and international protocols ratified by the United States and/or Canada depending on jurisdiction of management. Maryland DNR Forest Service does not participate in research on genetically engineered trees.

Audit Process

NSF initiated the SFI audit process with a series of planning phone calls and emails to reconfirm the scope of the audit, review the SFI Indicators and evidence to be used to assess conformance, verify that Maryland DNR Forest Service was prepared to proceed to the SFI Audit, and to prepare a detailed audit plan.

The audit was governed by a detailed audit plan designed to enable the audit team to efficiently determine conformance with the applicable requirements. The plan provided for the assembly and review of audit evidence consisting of documents, interviews, and on-site inspections of ongoing or completed forest practices.

During the audit NSF reviewed a sample of the written documentation assembled to provide objective evidence of conformance. NSF also selected field sites for inspection based upon the risk of environmental impact, likelihood of occurrence, special features, and other criteria outlined in the NSF protocols. NSF selected and interviewed stakeholders such as contract loggers, landowners and other interested parties, and interviewed employees within the organization to confirm that the SFI Standard was understood and actively implemented. The activities of the central office were reviewed against the multi-site requirements as well.

The possible findings of the audit included conformance, major non-conformance, minor non-conformance, opportunities for improvement, and practices that exceeded the requirements of the standard.

A report was prepared and final approval was done by an independent Certification Board Member assigned by NSF. Follow-up or Surveillance Audits are required by the Sustainable Forestry Initiative Standard[®]. The next Surveillance Audit is scheduled for the first week of April, 2020.

Overview of Audit Findings

Maryland's SFI Program demonstrated conformance against the SFI 2015-2019 Standard. There were one non-conformances 2019, and Seven "Opportunities for Improvement". As such, the program has earned continuing certification with the minor non-conformance.

Three OFI identified in the 2018 audit have been resolved:

1. Management plans were in process of being reviewed regarding accurately describing the status (ongoing vs. completed) of selected activities; SFI 2015-2019 Standards and Rules®, Section 2 – Forest Management, Indicator 1.1.1 requires "Forest management planning at a level appropriate to the size and scale of the operation".
2. Use of the trademark symbol (™) was reviewed for all documents and were updated; SFI 2015-2019 Standards and Rules®, Section 5 Part 4, Indicator 4.2 trademark.
3. Organization had a workshop to help improve awareness of predicted climate change patterns and the impacts to wildlife and biodiversity for foresters; SFI Indicator 10.3.2 requires a "Program Participants are knowledgeable about climate change impacts on wildlife, wildlife habitats and conservation of biological diversity through international, national, regional or local programs."

There was one new Non-Conformance in the 2019 audit.

Contract logger is a MD Master Logger, however there were issues with the equipment on-site. Dozer was persistently leaking on site onto the soil below the equipment, some oil was observed on the soil below the Skidder. Logger was not on site. No apparent safety equipment (no fire extinguishers & spill kits observed on all 3 machines on an active site), however, later interview stated that the fire extinguishers were behind the seats of the skidder and harvester out of view. Recent BMP inspection conducted by forester noted no issues. This process is not fully effective for SFI 2015-2019 Standards and Rules®, Section 2 – Forest Management, Indicator 11.1.4 Contractor education and training sufficient to their roles and responsibilities.

Progress in implementing these corrective action plans will be reviewed in subsequent surveillance audits.

Seven opportunities for improvement (OFI) were identified in the 2019 audit:

1. **SFI 2.1.1:** Documented *reforestation* plans, including designation of all harvest areas for either natural, planted or direct seeded regeneration and prompt *reforestation*, unless delayed for site-specific environmental or *forest health* considerations or legal requirements, through *planting* within two years or two *planting* seasons, or by planned *natural regeneration* methods within five years.

OFI: Regeneration criteria are forest-type specific. Confirmed that Western SFs use Oak-SILVAH for criteria and for protocols for regeneration surveys. No regeneration delays were observed in the field. Although planting is rarely done, there is an opportunity for improvement in the regeneration criteria in order to achieve acceptable species and stocking levels for naturally regenerating stands in the Eastern Region.

2. **SFI 2.2.5:** Use of Pesticides banned under the Stockholm convention and Persistent Organic pollutants.

OFI: Although Pesticides are currently checked against the FSC checklist, there is an opportunity to improve the chemical review process, both internally and with external contractors, to ensure that current and future uses of pesticides does not include pesticides banned under the Stockholm convention and Persistent Organic pollutants are not being used.

3. **SFI 3.1.3:** Monitoring of overall best management practices implementation.

OFI: The organization currently conducts BMP monitoring with written checklists. Different checklists are used in the Eastern Shore and the Western SFs. There is an opportunity to improve the difference in criteria used in the West vs the Eastern Shore (example with the criteria for 1-5 verses Yes NO and NA noted) in efforts to help improve consistency for evaluation of BMP effectiveness.

4. **SFI 8.2.1 Program Participants** with forest management responsibilities on public lands shall confer with affected *Indigenous Peoples* with respect to sustainable forest management practices. Indicator:

8.2.1 Program that includes communicating with affected *Indigenous Peoples* to enable Program Participants to:

- a) understand and respect traditional forest-related knowledge;
- b) identify and protect spiritually, historically, or culturally important sites;
- c) address the use of non-timber forest products of value to *Indigenous Peoples* in areas where Program Participants have management responsibilities on public lands; and
- d) respond to *Indigenous Peoples'* inquiries and concerns received.

OFI: Although the Chesapeake/Pocomoke Forest Citizens Advisory Committee member has been recently established, there is an opportunity to continue efforts and seek input from indigenous people, including all MD State Forest regions, as the last formal outreach efforts were completed 5-6 years ago and per interview, there is not a regularly scheduled interval to re-evaluate the MD DNR SF outreach efforts.

5. **SFI 11.1.2** Assignment and understanding of roles and responsibilities for achieving *SFI 2015-2019 Forest Management Standard objectives*.

OFI: There is an opportunity to improve the assignment and understanding of roles and responsibilities as it relates to contract requirements, per review of the Stone Mountain Road contract #0217. Internal contractual documents were incomplete on one page of the contract; per interview with multiple DNR staff, there were differing thoughts as to who was responsible for noting the official date and signature on the contract, i.e.: State Forest Staff vs. Central Office staff in Annapolis.

6. **SFI 11.1.3** Staff education and training sufficient to their roles and responsibilities.

OFI: While the seed mix used on landings and roads has been previously approved by State Wildlife staff for food plots and for the Erosion and Sediment Control plan, there is an opportunity to improve staff education and training as it relates to the seed mixture (species and ratios) currently being applied on landings and roads, as only non-native, naturalized species are being used.

7. **SFI 15.1.2:** System for collecting, reviewing, and reporting information to management regarding progress in achieving *SFI 2015-2019 Forest Management Standard objectives and performance measures*.

OFI: Currently the document "Internal Review-ISA-FIELD-CHECKLIST-ALL-SF- is used. There is an opportunity to consider using other foresters from different regions to help strength and improve current auditing processes.

These findings do not indicate a current deficiency, but served to alert Maryland DNR Forest Service to areas that could be strengthened or which could merit future attention.

NSF also identified the following areas where forestry practices and operations of Maryland DNR Forest Service exceed the basic requirements of the standard:

There was one area where the forestry program of Maryland DNR's Forest Service "Exceeds the Requirements":

- 1. The program exceeds the requirements for providing an exceptional range of high-quality recreational opportunities State Forests.
SFI Indicator 5.4.1 requires participants to "Provide recreational opportunities for the public, where consistent with forest management objectives."

General Description of Evidence of Conformity

NSF's audit team used a variety of evidence to determine conformance. The 2019 audit included office reviews in the following by the NSF audit team Chesapeake Forest, Pocomoke State Forest, Green Ridge State Forest, and the central office located in Annapolis, MD. Field visits were conducted in 3 out of a total of 6 State Forests. 2 field offices, 1 central office and 21 field sites were visited. The 21 field sites consisting of the 3 active timber harvests (hardwood 1st thinning, hardwood even aged, final harvest/clear cut and softwood 2nd thinning), 1 conversion softwood to hardwood, 5 recently closed sale with wildlife considerations, 2 with herbicide application with invasive species, 3 High Conservation Forest, 3 natural regenerations, 2 recreation sites, 2 inactive harvests, and 1 research site. There were also several roads, several smaller road-trail/stream crossings with cross drains and BMPs being applied.

A further description of the audit evidence is provided below, organized by SFI Objective.

Objective 1 Forest Management Planning

To ensure forest management plans include long-term sustainable harvest levels and measures to avoid forest conversion.

Summary of Evidence: The forest management plans for each state forest Chesapeake, Pocomoke and Green Ridge and supporting documentation and the associated inventory data and growth analyses were the key evidence of conformance for western and southern forests.

Objective 2 Forest Health and Productivity

To ensure long-term forest productivity, carbon storage and conservation of forest resources through prompt reforestation, afforestation, minimized chemical use, soil conservation, and protecting forests from damaging agents.

Summary of Evidence: Field observations and associated records including annual work plans and "State Forest Database" reports were used to confirm practices. Maryland DNR Forest Service has programs for reforestation, for protection against insects, diseases, and wildfire, and for careful management of activities which could potentially impact soil and long-term productivity. Visited a HWA site and an active burn site using fire for a long term management tool.

Objective 3 Protection and Maintenance of Water Resources

To protect the water quality of rivers, streams, lakes, wetlands and other water bodies through meeting or exceeding best management practices.

Summary of Evidence: Field observations of a range of sites were the key evidence. Auditors visited the portions of field sites that were close to water various types of water resources, (primary waterways, secondary streams and well defined vernal pools) generally riparian buffers, and confirmed that these buffers were flagged during planning, painted prior to harvests and noted for input into GIS.

Objective 4 Conservation of Biological Diversity

To manage the quality and distribution of wildlife habitats and contribute to the conservation of biological diversity by developing and implementing stand- and landscape-level measures that promote a diversity of types of habitat and successional stages, and the conservation of forest plants and animals, including aquatic species, as well as threatened and endangered species, Forests with Exceptional Conservation Value, old-growth forests and ecologically important sites.

Summary of Evidence: Field observations, written plans and policies for the protection of old growth, High Conservation Value Forests sites were visited during the audit.

Objective 5 Management of Visual Quality and Recreational Benefits

To manage the visual impact of forest operations and provide recreational opportunities for the public.

Summary of Evidence: Field observations of active and completed harvesting operations and policies/procedures for visual quality were assessed during the evaluation. NSF team visited recreation sites during the audit. NSF team also contacted various stakeholder seeking input and obtaining feedback on how the DNR balances public interests while providing various recreational opportunities.

Objective 6 Protection of Special Sites

To manage lands that are geologically or culturally important in a manner that takes into account their unique qualities.

Summary of Evidence: Field observations of completed operations, GIS maps and other records of special sites, training records, and written protection plans were all assessed during the evaluation. Partners within the DNR and outside stakeholders participated in identification of special sites and participated during the NSF audit.

Objective 7 Efficient Use of Fiber Resources

To minimize waste and ensure the efficient use of fiber resources.

Summary of Evidence: Field observations of recently completed operations, contract clauses, and discussions with supervising field foresters and with interview with a logger provided the key evidence.

Objective 8 Recognize and Respect Indigenous Peoples' Rights

To recognize and respect Indigenous Peoples' rights and traditional knowledge.

Summary of Evidence: All of the management plans include the policy statement developed to recognize and respect Indigenous Peoples' rights.

Objective 9 Legal and Regulatory Compliance

To comply with applicable federal, provincial, state and local laws and regulations.

Summary of Evidence: Field and office reviews of ongoing and completed operations were the most critical evidence. Foresters are licensed and have access to legal and regulatory listing electronic and hard copy.

Objective 10 Forestry Research, Science and Technology

To invest in forestry research, science and technology, upon which sustainable forest management decisions are based and broaden the awareness of climate change impacts on forests, wildlife and biological diversity.

Summary of Evidence: Discussions with stakeholders and support for research on state forest lands were the key evidence used. Forests are used for several ongoing research projects such as research projects involving, Wood rat biology, and a well as a major trial of a pesticide to control the Hemlock Woolly Adelgid which the NSF team visited.

Objective 11 Training and Education

To improve the implementation of sustainable forestry practices through appropriate training and education programs.

Summary of Evidence: Review of training records, and the records of support for the Maryland Master Logger Program. Further all harvests are conducted by logging crews with one or more Maryland Master Loggers. Training was check for licensed foresters and also for applicators applying chemicals on the forests.

Objective 12 Community Involvement and Landowner Outreach

To broaden the practice of sustainable forestry through public outreach, education, and involvement, and to support the efforts of SFI Implementation Committees.

Summary of Evidence: Records provided by the audited organization and interviews were used to confirm the requirements.

Objective 13 Public Land Management Responsibilities

To participate and implement sustainable forest management on public lands.

Summary of Evidence: The Citizen Advisory confirms the involvement with the public inputs does occur.

Objective 14 Communications and Public Reporting

To increase transparency and to annually report progress on conformance with the SFI Forest Management Standard.

Summary of Evidence: Reports filed with SFI Inc. and the SFI Inc. website provided the key evidence. The state forests web site includes the complete certification reports from the past years.

Objective 15. Management Review and Continual Improvement

To promote continual improvement in the practice of sustainable forestry by conducting a management review and monitoring performance.

Summary of Evidence: The state forests web site includes the organization's Sustainable Forestry Initiative Management Reviews for the past 10 years. The most recent of these program reviews, agendas and notes from field reviews, and interviews with personnel from all involved levels in the organization were assessed to determine conformance.

Relevance of Forestry Certification

Third-party certification provides assurance that forests are being managed under the principles of sustainable forestry, which are described in the Sustainable Forestry Initiative Standard as:

1. Sustainable Forestry

To practice sustainable forestry to meet the needs of the present without compromising the ability of future generations to meet their own needs by practicing a land stewardship ethic that integrates reforestation and the managing, growing, nurturing and harvesting of trees for useful products and ecosystem services such as the conservation of soil, air and water quality, carbon, biological diversity, wildlife and aquatic habitats, recreation and aesthetics.

2. Forest Productivity and Health

To provide for regeneration after harvest and maintain the productive capacity of the forest land base, and to protect and maintain long-term forest and soil productivity. In addition, to protect forests from economically or environmentally undesirable levels of wildfire, pests, diseases, invasive exotic plants and animals and other damaging agents and thus maintain and improve long-term forest health and productivity.

3. Protection of Water Resources

To protect water bodies and riparian areas, and to conform with forestry best management practices to protect water quality.

4. Protection of Biological Diversity

To manage forests in ways that protect and promote biological diversity, including animal and plant species, wildlife habitats, and ecological or natural community types.

5. Aesthetics and Recreation

To manage the visual impacts of forest operations, and to provide recreational opportunities for the public.

6. Protection of Special Sites

To manage lands that are ecologically, geologically or culturally important in a manner that takes into account their unique qualities.

7. Responsible Fiber Sourcing Practices in North America

To use and promote among other forest landowners sustainable forestry practices that are both scientifically credible and economically, environmentally and socially responsible.

8. Legal Compliance

To comply with applicable federal, provincial, state, and local forestry and related environmental laws, statutes, and regulations.

9. Research

To support advances in sustainable forest management through forestry research, science and technology.

10. Training and Education

To improve the practice of sustainable forestry through training and education programs.

11. Community Involvement and Social Responsibility

To broaden the practice of sustainable forestry on all lands through community involvement, socially responsible practices, and through recognition and respect of Indigenous Peoples' rights and traditional forest-related knowledge.

12. Transparency

To broaden the understanding of forest certification to the SFI Standard by documenting certification audits and making the findings publicly available.

13. Continual Improvement

To continually improve the practice of forest management, and to monitor, measure and report performance in achieving the commitment to sustainable forestry.

14. Avoidance of Controversial Sources including Illegal Logging in Offshore Fiber Sourcing

(Applies only to the SFI 2015-2019 Fiber Sourcing Standard)

To avoid wood fiber from illegally logged forests when procuring fiber outside of North America, and to avoid sourcing fiber from countries without effective social laws.

Source: Sustainable Forestry Initiative® (SFI) Standard, 2015–2019 Edition



For Additional Information Contact

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